

Exhibit 49

12/03/2020

82 to 85

<p style="text-align: right;">Page 82</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 anything about it specifically.</p> <p>3 Q. I think you said that you had already</p> <p>4 had something in the works at the time the move</p> <p>5 was made; was that -- was that your testimony?</p> <p>6 A. So, remember, I mentioned Greg Moore</p> <p>7 was already there well before Tariq had showed up.</p> <p>8 So that team and I were working very closely and</p> <p>9 so I -- I don't mind sharing my knowledge and</p> <p>10 experience.</p> <p>11 And when this -- the verticalization</p> <p>12 in Tariq's organization became a thing and Greg</p> <p>13 was asking me very respectfully hey, how should we</p> <p>14 do it, what works, where should we put you, what</p> <p>15 should you do, and so on and so forth, but this</p> <p>16 was just me and Greg; not within the context of</p> <p>17 what it means within this new organization that</p> <p>18 Tariq was trying to create.</p> <p>19 Q. And what have you discussed with Mr.</p> <p>20 Moore about what your role would be?</p> <p>21 A. That I would lead maybe how we --</p> <p>22 essentially what I do in OCTO and how I have these</p> <p>23 external engagements and I would be much more in</p> <p>24 front of the customers and kind of continue to do</p> <p>25 the product development efforts with the engineers</p>	<p style="text-align: right;">Page 84</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 now having some issues with the Box.</p> <p>3 Okay. I believe -- all right. A</p> <p>4 little technical difficulty myself.</p> <p>5 A. Is it 119?</p> <p>6 Q. It is going to be. I just have to</p> <p>7 get there.</p> <p>8 MR. GAGE: Oh, okay. So it is 119.</p> <p>9 A. I see it.</p> <p>10 Q. Okay. So you're looking at a copy of</p> <p>11 what was previously marked as Exhibit 119 with the</p> <p>12 Bates Number GOOG-ROWE-00017437 through 17438.</p> <p>13 Do you recognize this document?</p> <p>14 A. I think it was an e-mail we received.</p> <p>15 Q. Okay. Give me just one moment. I'm</p> <p>16 going to step away from my window a little bit.</p> <p>17 Do you recall receiving this</p> <p>18 document?</p> <p>19 A. Yes.</p> <p>20 Q. And was this document sent to you in</p> <p>21 connection with the move from OCTO to Mr.</p> <p>22 Shaukat's organization?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. That -- that was -- that was the</p> <p>25 guess, yes.</p>
<p style="text-align: right;">Page 83</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 and PMs, and that a maybe we should build a team</p> <p>3 around me and so forth. Those were all discussed,</p> <p>4 but I was still on the fence.</p> <p>5 Q. Were you told that other people would</p> <p>6 be moving into Mr. Shaukat's organization as well?</p> <p>7 A. We -- yes.</p> <p>8 Q. Who were you told would be moving?</p> <p>9 A. Me, Jeff Kember, Ben, Ulku. I think</p> <p>10 Chris had already moved out at the time into</p> <p>11 retail sales.</p> <p>12 Q. And was anything said with respect to</p> <p>13 why the four of you had been targeted for this</p> <p>14 move?</p> <p>15 A. It was sort of clear with our</p> <p>16 backgrounds, experiences, expertise.</p> <p>17 Q. Was it because each of the four of</p> <p>18 you had a background in a particular vertical or</p> <p>19 had vertical experience?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. Yes.</p> <p>22 Q. Okay. We're going to look at another</p> <p>23 document and this document --</p> <p>24 MR. GAGE: Already there or coming?</p> <p>25 MS. GREENE: Give me a minute. I'm</p>	<p style="text-align: right;">Page 85</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 Q. Okay. If you look at the third</p> <p>3 paragraph in this e-mail it says, "Follow-on</p> <p>4 messaging will clarify that the role you're moving</p> <p>5 into is a global client technical lead role." Do</p> <p>6 you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Were you told that that was the title</p> <p>9 you would have, global client technical lead?</p> <p>10 A. Didn't know. I think this was the</p> <p>11 first time I saw it and I'm trying to remember if</p> <p>12 I had this conversation before or after with Greg</p> <p>13 Moore, because he couldn't even explain it to me</p> <p>14 what it was and he was apol -- apologetic about</p> <p>15 it.</p> <p>16 Q. Do you see under Section 1 there's</p> <p>17 tabs with different titles listed or different</p> <p>18 positions listed?</p> <p>19 A. Yes.</p> <p>20 Q. Did you have any understanding</p> <p>21 of -- of how this all fit together?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Vaguely, yes.</p> <p>24 Q. As far as you understood or</p> <p>25 experienced, was there overlap between these</p>

12/03/2020

86 to 89

<p style="text-align: right;">Page 86</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 roles?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. Global client leads versus global</p> <p>5 client technical leads was definitely an ambiguity</p> <p>6 at best.</p> <p>7 Q. And what about with respect to</p> <p>8 technical solutions?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. So that was something I was familiar</p> <p>11 with it because we were trying to figure out how</p> <p>12 -- kind of this last mile, if you will, working</p> <p>13 with the customers and so forth. Again there was,</p> <p>14 you know, enough of an overlap between those</p> <p>15 three.</p> <p>16 Q. Okay. You can put that document</p> <p>17 aside.</p> <p>18 How long did you actually function</p> <p>19 under Mr. Shaukat or in his organization?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. Don't know exactly, but weeks.</p> <p>22 Q. I want you to look now at Exhibit --</p> <p>23 or Tab 122 --</p> <p>24 A. Yup.</p> <p>25 Q. -- which I think has been marked as</p>	<p style="text-align: right;">Page 88</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 this draft language would apply to both you, Ben,</p> <p>3 and Ulku?</p> <p>4 A. No.</p> <p>5 MR. GAGE: Objection.</p> <p>6 Q. What was your understanding?</p> <p>7 A. This was for -- this was for his role</p> <p>8 in the oil and gas vertical with Darryl.</p> <p>9 Q. Okay. Do you know how this would</p> <p>10 relate to your role?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. I mean, no, because this is not what</p> <p>13 I was -- I really wasn't paying much attention to</p> <p>14 it at that point, quite frankly.</p> <p>15 Q. During the time that you were in Mr.</p> <p>16 Shaukat's organization, did you report to Mr.</p> <p>17 Moore?</p> <p>18 A. Yes.</p> <p>19 Q. Did you have a reporting line to Mr.</p> <p>20 Shaukat?</p> <p>21 A. No.</p> <p>22 Q. Do you know to whom Ms. Rowe was</p> <p>23 reporting?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. I think Tariq because there was</p>
<p style="text-align: right;">Page 87</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 an exhibit previously.</p> <p>3 MR. GAGE: Tab 122?</p> <p>4 MS. GREENE: Yes.</p> <p>5 A. 120.</p> <p>6 MS. GREENE: Exhibit 120.</p> <p>7 MR. GAGE: Oh, Exhibit 120. Okay,</p> <p>8 yeah. I was looking at the tab. Is this the</p> <p>9 June 27th e-mail?</p> <p>10 MS. GREENE: Yeah.</p> <p>11 Q. So you're looking at what was</p> <p>12 previously marked as Exhibit 120, Bates stamped</p> <p>13 GOOG-ROWE-P00000761. Do you recognize this</p> <p>14 e-mail?</p> <p>15 A. Yes.</p> <p>16 Q. What do you recognize this to be?</p> <p>17 A. It was an e-mail Ben sent to me and</p> <p>18 Ulku.</p> <p>19 Q. And what was the context in which he</p> <p>20 sent you this e-mail?</p> <p>21 A. He was working with -- I can't</p> <p>22 remember -- Darryl. I think it was the oil and</p> <p>23 gas guy and role for himself and how they would</p> <p>24 define it and so forth.</p> <p>25 Q. And it was your understanding that</p>	<p style="text-align: right;">Page 89</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 nobody else there.</p> <p>3 Q. Had she expressed anything to you</p> <p>4 with respect to Mr. Shaukat's treatment of her?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Yes.</p> <p>7 Q. What did she express to you?</p> <p>8 A. That she was frustrated she wasn't</p> <p>9 getting any -- she wasn't being included and that</p> <p>10 kind of stuff.</p> <p>11 Q. Anything else you recall her</p> <p>12 expressing to you?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. That she thought she should be</p> <p>15 considered for the role of that vertical lead and</p> <p>16 I encouraged her.</p> <p>17 Q. Did you discuss Ms. Rowe's</p> <p>18 consideration for the vertical lead position with</p> <p>19 anyone other than Ms. Rowe?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. I don't recall. Maybe Ben because we</p> <p>22 were very close, the three of us were very close.</p> <p>23 Q. Is there anything else you recall</p> <p>24 discussing with Ms. Rowe with respect to the</p> <p>25 vertical lead role?</p>